

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft permit No. V-05-008
Mouser Custom Cabinetry
2112 N. Hwy 31 W., Elizabethtown, Kentucky
February 8, 2005
REVIEWER: Sajjad Quabili
Plant I.D. 21-093-00043
Application Log # 54976

SOURCE DESCRIPTION:

Mouser Custom Cabinetry operates a wood furniture manufacturing plant at Elizabethtown. The source applied for the renewal of their Title V/Synthetic Minor permit. The facility is a major source for VOC and HAP emissions.

PERMITTING BACKGROUND:

Currently, Mouser is holding a Title V/Synthetic Minor permit. The allowable plant-wide VOC emission is less than or equal to 225 tons per year.

COMMENTS:

The VOC emission limit for the permit-renewal will remain unchanged.

APPLICABLE REGULATIONS:

Mouser is subject to the following regulations for their wood furniture manufacturing operations:

- A. 40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, applicable to an affected facility that is engaged, either in part or in whole, in the manufacture of wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2 (Compliance date: December 7, 1998).
- B. 401 KAR 59:010, New process Operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulate, commenced on or after July 2, 1975.
- C. 401KAR 50:012 Section 1(2) General Application of Administrative Regulations and Standards. In the absence of a standard specified in 401 KAR 50 to 65, administrative regulations, all major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.
- D. 401 KAR 63:020; Potentially hazardous matter or toxic substances, applicable to each affected facility (s) which emits or may emit potentially hazardous matter or toxic substances.

PERIODIC MONITORING:

The Division is requiring Mouser to keep daily records of usage of stains, paints and thinners at each of the spraying booth and to summarize those records at the end of each month. The source shall also keep records of the monthly and twelve months rolling total for VOC and HAP emissions at the plant. Board feet of wood used and hours of operation for the wood working process shall also be recorded on monthly basis. Mouser is required to report to the Frankfort Regional Office semi-annually.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.